

Exhibit 1

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1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE EASTERN DISTRICT OF VIRGINIA

3 Richmond Division

4 -----x

5 ePLUS INC.,)

6 Plaintiff,) Civil Action No.

7 v.) 3:09-CV-620 (JRS)

8 LAWSON SOFTWARE, INC.,)

9 Defendant.)

10 -----x

11

12 Videotaped Deposition of DEAN J. HAGER

13 Washington, DC

14 Friday, January 6, 2012

15 9:17 a.m.

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19

20 Job No.: 16461

21 Pages: 1 - 388

22 Reported by: Debra A. Whitehead

VIDEOTAPED DEPOSITION OF DEAN J. HAGER
CONDUCTED ON FRIDAY, JANUARY 6, 2012

13
1 formed a company that acquired Lawson. Is that right? 09:21:58
2 Not sure of the circumstances? 09:22:02
3 A Actually -- actually, I don't believe 09:22:04
4 that's right, but I would be the wrong person to 09:22:05
5 answer the question. 09:22:07
6 Q Fair enough. 09:22:08
7 A And so you say you're currently not 09:22:15
8 employed by anybody. Is that right? 09:22:16
9 A Correct. 09:22:18
10 Q Who asked you to appear as a witness then 09:22:18
11 here today? 09:22:25
12 A Counsel, Dan Thomasch. 09:22:29
13 Q Okay. And you understand that there's 09:22:31
14 going to be a hearing on some proceedings in February 09:22:34
15 and March of this year before Judge Payne? 09:22:38
16 A That's my understanding. 09:22:41
17 Q Okay. Will you be available for that 09:22:42
18 hearing, if necessary? 09:22:47
19 MR. THOMASCH: Objection to form. 09:22:48
20 THE WITNESS: Do I answer? 09:22:52
21 MR. THOMASCH: You answer. 09:22:53
22 THE WITNESS: Okay. Thank you. 09:22:54

VIDEOTAPED DEPOSITION OF DEAN J. HAGER
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	14
1	A My intent is to put that on my calendar
2	and -- and come and help in any way I can.
3	Q Well, I just want to be sure. Because, I
4	mean, there are ways perhaps that, you know, we might
5	be able to arrange for your attendance. But I'm just
6	wondering, your present intent is that you would
7	appear at the hearing if requested. Is that --
8	A That's my present intent, yes.
9	Q When you resigned from Lawson, can you tell
10	me what your last position and title was?
11	A Executive vice-president of S3 industries.
12	Q And that was the same position you had in
13	March of 2011 when you testified at the hearing before
14	Judge Payne in Richmond. Correct?
15	A Yes.
16	Q Okay. As part of your termination, was
17	there any agreement reached between Lawson and
18	yourself with respect to your cooperation in this
19	litigation?
20	A Meaning did I agree to cooperate in
21	return -- I'm -- one more time.
22	Q Let me rephrase the question.